

## REMARKS

This is intended as a full and complete response to the Office Action dated September 17, 2004, having a shortened statutory period for response set to expire on December 17, 2004. Claims 21, 24-27, 29-31, 38 and 41-43 stand rejected, and claims 28, 22-27 and 44 are indicated to be allowable by the Examiner. Claims 21, 24-31, 33-38, 42, 43, and 44 remain pending in the application and are shown above with new claim 45. Please reconsider the claims pending in the application for reasons discussed below.

### ***Claim Rejections – 35 U.S.C. § 102***

Claims 21, 24-27, 29-31, 38 and 41-43 stand rejected under 35 USC § 102(a) as being anticipated by *Russ et al.* (U.S. Patent No. 5,787,933).

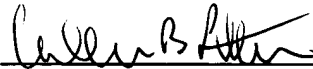
Applicants respectfully traverse the rejection. Specifically, a claim is anticipated only if each and every element in the claim is found, either expressly or inherently described, in a single prior art reference. See, MPEP § 2131; *Trintec Indus., Inc. v. Top-U.S.A. Corp.*, 295 F.3d 1292, 1295 (Fed. Cir., 2002). More specifically, inherent anticipation requires that the missing descriptive material is necessarily present, not merely probably or possibly present, in the prior art. *Trintec Indus., Inc.*, at 1295.

Applicants submit that *Russ et al.* merely discloses a method of making a connection between a tube and a sleeve while being completely silent with regard to running the tube and/or sleeve into a bore. However, each of the claims pending requires an act of either “running the liner into the bore” or running a first and/or a second tubular into a bore. Clearly, *Russ et al.* cannot expressly or inherently describe these limitations as required to anticipate the claims without ever even mentioning any type of bore. Thus, *Russ et al.* fails to teach, show or suggest each and every limitation in the claims. Accordingly, Applicants submit that the claims are allowable and respectfully requests allowance thereof.

**Conclusion**

The reference cited by the Examiner does not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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